REMARKS

Summary of the Office Action

In the Office Action, claims 1-4 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,687,297 to *Coonan, et al.* ("*Coonan*") Applicants respectfully traverses these rejections for the following reasons.

Summary of the Response to the Office Action

Applicants respectfully submit that *Coonan* does not anticipate the present invention. New claims 5 and 6 are added to provide an alternative scope of protection. Accordingly, claims 1-6 are pending for further consideration.

All Claims are Allowable

Claims 1-4 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,687,297 to *Coonan*. This rejection is respectfully traversed in view of the following arguments.

Applicants submit that independent claim 3 includes features not found or taught in *Coonan*. Specifically, independent claim 3 recites a combination of features including at least a "a device for reading an image recorded on film . . . a representation device for representing the thus read image . . . wherein images processed states . . . which gradually changed . . . and which are arranged at least in a one-dimensional direction are represented in succession on a screen of the representation device." Applicants respectfully submit that at least these features are not taught or suggested by *Coonan*.

Coonan discloses a method and apparatus for tuning the appearance and controlling dot

growth of bitmap images rendered on a printing system. The invention operates to recognize

those pixels within a bitmap image that are appropriate for alteration and, in response to

downloadable output values, adjusts the identified pixels so as to ensure a desired output. See

Abstract of *Coonan*. *Coonan* reads a document using a CCD array and converts the analog CCD

video signals into digital signals. *Coonan* then applies appearance tuning and augmented

compact dot growth (ACDG) functions of the printing system which adjusts the lightness and/or

darkness of the printer output and reconstructs lost data from an image encoding process,

respectively. See *Coonan* at col. 1, lines 27-40. In other words, *Coonan* discloses a method and

apparatus for enhancing the image of a bitmap.

Coonan does not disclose a photographic print processing apparatus or method as does

the present invention. Notably, *Coonan* does not disclose "a device for reading an image

recorded on film," as recited in claim 3. Contrary to the Office Action which states that *Coonan*

comprises "a device (scanner 18) for reading an image recorded on film (col. 7, lines 29-33),"

Coonan does not read or scan photographic film. Nowhere in *Coonan* is photographic film even

mentioned.

Further, the "representation device for representing the thus read image," feature recited

in claim 3 cannot be anticipated by the "image processing system 22" of *Coonan* as suggested in

the Office Action. The "image processing system 22" of *Coonan* converts signals obtained by

the scanner 18 into digital signals, but it does not represent them in an image. See col. 7, lines

33-38 of *Coonan*. In other words, *Coonan* does not represent the scanned data in a viewable

form like the present invention.

Contrary to the Office Action, *Coonan* also does not disclose the features of "images processed states . . . which are gradually changed in at least one attribute . . . and which are arranged at least in a one-dimensional direction are represented in succession on a screen of the representation device," as recited in claim 3. The Office Action states that these features are anticipated by *Coonan* at col. 5, lines 63-67. However, the citation in *Coonan* discusses only a glossary definition of the term "neighboring operation," which is described as an "image processing operation that uses data relating to one part of an image to obtain data relating to another part of an image." See *Coonan* at col. 5, lines 63-67. Applicants respectfully submit that "images processed states" arranged in a one-dimensional direction, displaying repetitive film images with a single changed attribute (*e.g.*, hue), does not correlate to using "data relating to one part of an image to obtain data related to another part of an image" as stated in *Coonan*. For at least the reasons above-mentioned, Applicants respectfully submit that *Coonan* cannot anticipate the present invention.

Applicants respectfully submit that independent claim 1 also includes features not found or taught in *Coonan*. Specifically, independent claim 1 recites a combination of features including at least "representing a plurality of images arranged in a two-dimensional array on a display screen wherein images arranged at least in a one-dimensional direction in succession among said plurality of images are images processed states of which are gradually changed in at least one attribute of image proceeding . . . performing image verification based on the thus represented plurality of images." Applicants respectfully submit that at least these features are

not taught or suggested by *Coonan*.

The Office Action states that the "two-dimensional array" feature is found at col. 5, lines 36-41; the "one-dimensional direction" feature is found at col. 5, lines 40-43; and the change of "images processed states" feature is found at col. 5, lines 63-67 of *Coonan*. On the contrary, *Coonan* (col. 5, lines 36-43) defines an item of data as being either a two-dimensional array or a one-dimensional array (*i.e.*, raster). *Coonan* merely describes a definition of an item of data or pixel. See col. 14, lines 15-35 of *Coonan*. *Coonan* does not describe representing a plurality of images on a display screen with the gradual change of a singular attribute distributed in a one-dimensional direction. The conflicting descriptions are not compatible and cannot be reconciled.

Further, the above-mentioned argument concerning "images processed states" still holds true. The "images processed states" feature does not correlate to using "data relating to one part of an image to obtain data related to another part of an image" as stated in col. 5, lines 63-67 of *Coonan*. Additionally, the claimed feature "performing image verification based on the thus represented plurality of images," is not satisfied by the so-called "neighborhood operation" described in col. 5, lines 63-67 of *Coonan*.

As pointed out in MPEP § 2131, "[t]o anticipate a claim, the reference must teach every element of the claim." "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. Of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Therefore, Applicants respectfully assert that the rejections under § 102(b) should be withdrawn because *Coonan* does not teach or suggest each feature of independent claims 1 and 3.

Additionally, it is further respectfully submitted that dependent claims 2 and 4 are also allowable insofar as it recites the patentable combinations of features recited in independent claims 1 and 3, respectively, as well as reciting additional features that further distinguish over the applied art. Accordingly, withdrawal of all the rejections under 35 U.S.C. § 102(b) is respectfully requested.

New independent claims 5 and 6 are added to provide an alternative scope of protection and are also allowable for the same reasons above-mentioned. Accordingly, approval of claims 5 and 6 is respectfully requested.

CONCLUSION

In view of the foregoing, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. §1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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